

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

CRYSTAL LONG,

Plaintiff,

v.

**PENDRICK CAPITAL PARTNERS II,
LLC,**

**ABILITY RECOVERY SERVICES,
LLC,**

**EXPERIAN INFORMATION
SOLUTIONS, INC.,**

and

**EQUIFAX INFORMATION SERVICES,
LLC,**

Defendants.

Civil Action No.

8:17-cv-01955-GJH

MOTION FOR AN EXTENSION OF CASE MANAGEMENT DATES

Defendant, Ability Recovery Services, LLC, by and through its counsel, Marshall Dennehey Warner Coleman & Goggin, P.C. hereby respectfully moves the Court for an Order extending the discovery end date for this matter sixty (60) days and for an extension for the remaining case management deadlines regarding the matter for the following reasons:

1. In her Complaint Plaintiff alleges that Defendant, Ability Recovery Services, LLC ("ARS") violated the Fair Credit Reporting Act, 15 U.S.C. § 1682, *et seq.*, the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*, the Maryland Consumer Debt Collection Act, Md. Code Ann., Com. Law § 14-201, *et seq.*, the Maryland Consumer Protection Act, Md. Code Ann., Com. Law § 13-301, *et seq.* and advances claims for defamation, declaratory relief and injunctive in regard to ARS' attempts to recover a debt obligation.

2. In her Amended Complaint Plaintiff alleges, *inter alia*, that "she lives with anxiety that at any moment her employer could check her credit", that "her employer requires good credit and a solid financial reputation" and that "credit and trustworthiness are of great importance for the maintenance of her employment, and for potential career advancement." SEE ECF 2, paragraphs 8 and 57.

3. On December 15, 2017 the Honorable George Jarrod Hazel granted an Order extending the discovery deadline for this matter to February 22, 2018 and modifying the additional case management deadline accordingly. SEE ECF 29.

4. The deposition of Plaintiff, Crystal Long is scheduled to take place on February 19, 2018 in Silver Spring, Maryland. The depositions of ARS' representatives are scheduled to take place on February 22, 2018 in Moosic, Pennsylvania.

5. As per Plaintiff's allegations in her Complaint, ARS believes that Plaintiff's employer at the time of when the alleged violative conduct occurred possesses significant information and documentation pertaining to both Plaintiff's factual allegations and Plaintiff's alleged damages.

6. As such, ARS is seeking a sixty (60) day extension of the discovery deadline of this matter to April 24, 2018 (or earlier) and an extension of the remaining case management deadlines regarding the matter to allow for ARS to issue subpoenas to Plaintiff's employer for the specific information and

documentation pertaining to Plaintiff's allegations and damages as alleged in her Amended Complaint.

WHEREFORE, Defendant, Ability Recovery Services, LLC respectfully requests that this Honorable Court grants an extension of the discovery deadline of the matter to April 24, 2018 and to modify the corresponding case management deadlines accordingly, pursuant to the corresponding Proposed Order.

**MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN, P.C.**

By: /s/ Armand J. Della Porta, Esq.
Armand J. Della Porta, Esquire (# 28612)
1007 N. Orange Street, Suite 600
P.O. Box 8888
Wilmington, DE 19899
(302)552-4323
ajdellaporta@mdwgcg.com
Attorneys for Defendant
Ability Recovery Service, LLC

Dated: February 19, 2018

CERTIFICATE OF SERVICE

I certify that on this day I served a copy of the foregoing document to all counsel by CM/ECF, which service satisfies the Federal Rules of Civil Procedure.

**MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN, P.C.**

By: /s/ Armand J. Della Porta, Esq.

Dated: February 19, 2018